

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

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|--------------------------------|---|--------------------|
| KATHERINE GUILL, et al., |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | Case No.19-CV-1126 |
| |) | Class Action |
| |) | |
| BRADLEY R. ALLEN, SR., et al., |) | |
| |) | |
| Defendants. |) | |

PLAINTIFFS' CONSENT MOTION FOR LEAVE TO EXCEED WORD LIMIT

Plaintiffs respectfully move the Court for leave to exceed the word limit set out in Local Rule 7.3(d) for their forthcoming briefs in support of and in response to any dispositive motions.

In support of this motion, Plaintiffs state the following:

1. Plaintiffs are a certified class of “[a]ll people who are arrested and charged with non-domestic violence offenses who are or will be detained in the Alamance County Detention Center because they are unable to pay monetary conditions of pretrial release.” (Doc. 67 at 2).
2. Plaintiffs filed this action on November 12, 2019, challenging Defendants’ policy and practice of imposing cash bail in Alamance County. Plaintiffs brought Fourteenth Amendment claims alleging wealth-based detention, substantive due process, and

procedural due process violations, and a Sixth Amendment claim alleging violation of the right to counsel. (Doc. 1).

3. On May 8, 2020, the Court entered a consent preliminary injunction requiring additional procedures at bail hearings, and requiring Defendants to report certain information to Plaintiffs. (Doc. 56).

4. Since that time, the parties have engaged in extensive discovery. Defendants produced thousands of pages of documents, Plaintiffs produced six expert reports, and the parties conducted thirteen depositions.

5. All parties have noticed their intent to file dispositive motions, which are due to be filed on or before July 7, 2022. (Docs. 91, 92, 93).

6. Due to the complexity of the issues raised in this case and the potential impact on the public interest, Plaintiffs respectfully request an enlargement of the word count limitation for briefs filed in support of any motion for summary judgment and responsive briefs from 6,250 words to 8,750 words. These enlargements are reasonably necessary to fully address the issues raised and to ensure that Plaintiffs' counsel can adequately represent the interests of all class members.

7. Counsel for Defendants consent to this request provided that they receive the same relief.

WHEREFORE, Plaintiffs respectfully ask the Court to grant leave for all parties to file opening and response summary judgment briefs up to and including 8,750 words.

This the 27th day of June, 2022.

/s/ Katherine Hubbard

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**Appearing by special appearance in accordance
with Local Rule 83.1(d).*

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on June 27, 2022, I filed the foregoing document using the Court's electronic filing system, which will effect service on all counsel of record.

/s/Daniel K. Siegel
Daniel K. Siegel

Counsel for Plaintiffs